

MEMO

NEW JERSEY STATE DEPARTMENT OF ENVIRONMENTAL PROTECTION

TO _____ File _____ DATE **NOV 20 1985**

FROM _____ Al Navidi *A.N.*

SUBJECT _____ Orbis Site Visit - Newark, NJD 010 910 099

On Friday, November 15, 1985, BHWE engineers: Al Navidi and Ernie Kuhlwein conducted a site visit to the subject facility, where they met the following facility personnel:

Bill Amaduci - Manager, Orbis Products
Bob Amaduci - General Manager (201) 824-3144
David Reger - Attorney, Stryker, Tams and Dills (201) 624-9300

Background

Orbis is a manufacturer of Fragrances, Flavors, pharmaceuticals and Aromatic compounds. The facility had requested to be delisted on June 16, 1981, since they are not acting as a TSD facility. Red Rutkowski of BHWE had visited this site in August of 1984 and had found several problems. One problem was the accumulation of drums at the edge of the facility, which also seemed to cause problems for the neighbors. The second problem was the storage of hazardous waste containers, which was done in a very disorderly manner.

In the beginning of the visit, both Bill and Bob Amaduci advised us that they had been placed on EPA's list as a TSD only by mistake, and that they have always been only a generator and they had no intention of acting as a TSD. Therefore, the purpose of the visit was to inspect the facility before the delisting can occur.

Observations

Roughly between 100-200 Orange drums were observed inside the warehouse, and Bill Amaduci advised us that they were all filled with Orange Oil, imported from Brazil, and used in the manufacturing of fragrances. As a result of separation of water from these oils, they generate a hazardous waste.

Three large tanks were observed on-site, all rusted and in a poor condition. These 3 tanks were diked and used in a chain and they were involved in the waste water treatment. Tank number 3 in the chain (OT 100) was the last tank used in this chain, and Bill Amaduci advised us that the aforementioned tank was basically filled with a mixture of solvents (ethanol and methanol) and that the contents would be shipped off-site, once the tank reaches a certain volume.

Further down, a fenced area was observed, and inside the fenced and pad-locked area, there were two (2) large basins (one used as an overflow basin to the other one), that were being regulated under IWMF. Bob informed us that the basins were discharged to PVSC.



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No hazardous waste drums were observed on-site. Roughly about 200 containers, all different shapes and sizes, were observed in the storage building. This building was in an extremely poor condition, both inside and outside, and all of the containers were managed in a poor manner (no labels, some leaking). Bob informed us that they were mostly Neutralization caustics and none was hazardous, but few containers were observed labelled cyano water. The rest were apparently raw materials and some were catalysts. Bob also informed us that the contents of these containers would be transferred to tanks at some point, then used or treated, while the rest would be declared as unfit products. No one had an idea about the time period these containers were being stored in that particular area.

The only major problem seemed to be the storage and treatment in the 3 above mentioned tanks. The first tank was for collection of feed, then the contents of this tank would be sent to the second tank (phase separator), where they would be treated and then sent to the third tank. Bob informed us that most of the waste (up to even 90%) was water. Ernie advised them that their material was considered to be hazardous, even before entering the tanks to be treated.

After the site inspection, everyone was led to Bill's office, where all these problems were discussed. David Reger, the company's attorney, advised us that the company had never been a TSD and had no intention of being one, but also replied that they would fully cooperate in order to solve this problem and be listed as a "generator only". Ernie later advised them that their tanks could be considered as IWMF and that they could be delisted. This decision would be pending on DWR's Ken Goldstein's decision whether to consider this as an IWMF case. They were informed that they would not have any problem storing their waste, since all waste would be shipped off-site in less than 90 days. They were given several different options:

1. Close all tanks and submit a closure plan for all three of them.
2. Upgrade the tanks if they decide to store waste in them, but for less than 90 days.
3. Since new regulations were being drafted shortly about storage in tanks for less than 90 days, they could also wait until these regulations were finalized, then comply with them and start storing for less than 90 days.
4. They were asked to inform the Bureau as soon as possible about whether they would like to store their waste in tanks or just drums.

All Bob, Bill and David Reger were informed that they would be hearing from us on this matter, and that the final decision will depend on DWR's Ken Goldstein. A memo is being sent to Ken regarding this matter from this Bureau, so a final decision could be reached and the facility could be delisted sooner.

EP12/slw